

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**

SEE ATTACHMENT

- ☐
- Petty
- 
- ☐
- Minor
- 
- ☐
- Misdemeanor
- 
- ☒
- Felony

PENALTY: SEE ATTACHMENT

Name of District Court, and/or Judge/Magistrate's Office

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

**DEFENDANT - U.S.**

EDITH NELSON (a/k/a Edith Honrubia Nelson, a/k/a Edith Grutas)

DISTRICT COURT NUMBER

CR08-477<sub>DLJ</sub>**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

IRS-CI and ICE

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form JOSEPH P. RUSSONIELLO

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

DEBORAH R. DOUGLAS, AUSA

**DEFENDANT****IS NOT IN CUSTODY**

- 1)
- ☒
- Has not been arrested, pending outcome this proceeding.
- 
- If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**

- 4)
- ☐
- On this charge
- 
- 5)
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
- 
- 6)
- ☐
- Awaiting trial on other charges
- 
- If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... If Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
**PROCESS:**
☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

**ADDITIONAL INFORMATION OR COMMENTS**

## OFFENSES AND PENALTY SHEET

Defendant Edith Nelson (a/k/a Edith Honrubia Nelson, a/k/a Edith Grutas)

Count One: Title 18, United States Code, Section [Conspiracy to Commit Bank/Wire Fraud]

Any person who attempts or conspires to commit any offense under this chapter shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the attempt or conspiracy.

Counts Two Through Thirty-One: Title 18, United States Code, Section 1344 [Bank Fraud]

30 years imprisonment, five years supervised release, \$250,000 fine, \$ 100 special assessment

Counts Thirty-Two Through Sixty-One: Title 18, United States Code, Section 1343 [Wire Fraud]

30 years imprisonment, five years supervised release, \$250,000 fine, \$ 100 special assessment

Count Sixty-Two: Title 18, United States Code, Section 1956(h) [Money Laundering Conspiracy]

The maximum penalty for a § 1956(h) conspiracy is the same as the penalty for the offense that is the object of the conspiracy, *i.e.*, 20 years for a § 1956 offense, and 10 years for a § 1957 offense as follows:.

Title 18, United States Code, Section 1956(a)(1)(B)(i) [Money Laundering]

20 imprisonment, three years supervised release, \$500,000 fine or twice the value of the property involved in the transaction, whichever is greater, and \$100 special assessment.

Title 18, United States Code, Section 1957 [Money Laundering: Transactions Greater than \$10,000]

10 years imprisonment, 3 years supervised release, \$100 special assessment, and \$250,000 fine (or not more than twice the amount of the criminally derived property involved in the transaction).

Count Sixty-Three Through One Hundred Thirteen: Title 18, United States Code, Section 1957 [Money Laundering: Transactions Greater than \$10,000]

See penalties above

Count One Hundred Fourteen: Title 26, United States Code, Section 7201  
[Income Tax Evasion]

5 years imprisonment, 3 years supervised release, \$100,000 fine, and \$100 special assessment.

Counts One Hundred Fifteen Through One Hundred Twenty-Six: Title 8, United States Code,  
Section 1324(a)(1)(A)(iii) [Harboring of Illegal Aliens]

5 years imprisonment, three years supervised release, \$250,000 fine, \$ 100 special assessment

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
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- ☐
- Misdemeanor
- 
- ☒
- Felony

PENALTY: SEE ATTACHMENT

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

RONALD NELSON

DISTRICT COURT NUMBER

CR08-477 DLJ

DEFENDANT

**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1) ☒ If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

 If "Yes" give date filed                     

DATE OF ARREST

Month/Day/Year

Or... If Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

IRS-CI and ICE

☐ person is awaiting trial in another Federal or State Court, give name of court                     
☐ this person/proceeding is transferred from another district per (circle one) FRCp 20, 21, or 40. Show District                     
☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW DOCKET NO.                     
☐ this prosecution relates to a pending case involving this same defendant
MAGISTRATE CASE NO.                     
☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under                     

Name and Office of Person

Furnishing Information on this form JOSEPH P. RUSSONIELLO☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

DEBORAH R. DOUGLAS, AUSA**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT
Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:                     Date/Time:                     Before Judge:                     Comments:

## OFFENSES AND PENALTY SHEET

Defendant Ronald Nelson

Count One: Title 18, United States Code, Section [Conspiracy to Commit Bank/Wire Fraud]

Any person who attempts or conspires to commit any offense under this chapter shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the attempt or conspiracy.

Title 18, United States Code, Section 1344(1) & (2) [Bank Fraud]

30 years imprisonment, five years supervised release, \$250,000 fine, \$ 100 special assessment

Title 18, United States Code, Section 1343 [Wire Fraud]

30 years imprisonment, five years supervised release, \$250,000 fine, \$ 100 special assessment

Count One Hundred Fourteen: Title 26, United States Code, Section 7201[Income Tax Evasion]

5 years imprisonment, 3 years supervised release, \$100,000 fine, and \$100 special assessment.

Counts One Hundred Fifteen Through One Hundred Twenty-Six: Title 8, United States Code, Section 1324(a)(1)(A)(iii) [Harboring of Illegal Aliens]

5 years imprisonment, three years supervised release, \$250,000 fine, \$ 100 special assessment

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**OFFENSE CHARGED**

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- Petty
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- Minor
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- Misdemeanor
- 
- ☒
- Felony

PENALTY: SEE ATTACHMENT

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

NELDA ASUNCION

DISTRICT COURT NUMBER

CR08-477

 FILED  
 JUL 17 2008  
 RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND
**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

IRS-CI and ICE

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

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SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under
**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☒
- If not detained give date any prior summons was served on above charges
- 
- 2)
- ☐
- Is a Fugitive
- 
- 3)
- ☐
- Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)
- ☐
- On this charge
- 
- 5)
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
- 
- 6)
- ☐
- Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

Name and Office of Person

Furnishing Information on this form JOSEPH P. RUSSONIELLO

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

DEBORAH R. DOUGLAS, AUSA

**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

## OFFENSES AND PENALTY SHEET

Defendant Nelda Asuncion

Count One: Title 18, United States Code, Section [Conspiracy to Commit Bank/Wire Fraud]

Any person who attempts or conspires to commit any offense under this chapter shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the attempt or conspiracy.

Counts Two Through Twenty-Three: Title 18, United States Code, Section 1344 [Bank Fraud]

30 years imprisonment, five years supervised release, \$250,000 fine, \$ 100 special assessment

Counts Thirty-Two Through Fifty-Seven: Title 18, United States Code, Section 1343 [Wire Fraud]

30 years imprisonment, five years supervised release, \$250,000 fine, \$ 100 special assessment

Count Sixty-Two: Title 18, United States Code, Section 1956(h) [Money Laundering Conspiracy]

The maximum penalty for a § 1956(h) conspiracy is the same as the penalty for the offense that is the object of the conspiracy, *i.e.*, 20 years for a § 1956 offense, and 10 years for a § 1957 offense as follows:.

Title 18, United States Code, Section 1956(a)(1)(B)(i) [Money Laundering]

20 imprisonment, three years supervised release, \$500,000 fine or twice the value of the property involved in the transaction, whichever is greater, and \$100 special assessment.

Title 18, United States Code, Section 1957 [Money Laundering: Transactions Greater than \$10,000]

10 years imprisonment, 3 years supervised release, \$100 special assessment, and \$250,000 fine (or not more than twice the amount of the criminally derived property involved in the transaction).

Count Sixty-Three Through Ninety-Eight: Title 18, United States Code, Section 1957 [Money Laundering: Transactions Greater than \$10,000]

See penalties above



AO 257 (Rev. 6/78)

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING

## OFFENSE CHARGED

SEE ATTACHMENT

- ☐
- Petty
- 
- ☐
- Minor
- 
- ☐
- Misdemeanor
- 
- ☒
- Felony

PENALTY: SEE ATTACHMENT

Name of District Court, and/or Judge/Magistrate

NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

## DEFENDANT - U.S.

CRISTETA LAGAREJOS

DISTRICT COURT NUMBER

CR08-477

DLJ

## DEFENDANT

## IS NOT IN CUSTODY

- Has not been arrested, pending outcome this proceeding.
- 1) ☒ If not detained give date any prior summons was served on above charges

- 2)
- ☐
- Is a Fugitive

- 3)
- ☐
- Is on Bail or Release from (show District)

## IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes  
 been filed? ☐ No

 If "Yes"  
 give date  
 filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

IRS-CI and ICE

- ☐
- person is awaiting trial in another Federal or State Court, give name of court

- ☐
- this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

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- this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW  
DOCKET NO.

- ☐
- this prosecution relates to a pending case involving this same defendant

MAGISTRATE  
CASE NO.

- ☐
- prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form JOSEPH P. RUSSONIELLO

☒ U.S. Attorney ☐ Other U.S. Attorney

Name of Assistant U.S.

Attorney (if assigned)

DEBORAH R. DOUGLAS, AUSA

## ADDITIONAL INFORMATION OR COMMENTS

## PROCESS:

- ☐
- SUMMONS
- ☐
- NO PROCESS\*
- ☒
- WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

- ☐
- Arraignment
- ☐
- Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:



## OFFENSES AND PENALTY SHEET

Defendant Cristeta Lagarejos

Count One: Title 18, United States Code, Section [Conspiracy to Commit Bank Fraud/Wire Fraud]

Any person who attempts or conspires to commit any offense under this chapter shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the attempt or conspiracy.

Counts Twenty-Four Through Thirty-One: Title 18, United States Code, Section 1344 [Bank Fraud]

30 years imprisonment, five years supervised release, \$250,000 fine, \$ 100 special assessment

Counts Fifty-Eight Through Sixty-One: Title 18, United States Code, Section 1343 [Wire Fraud]

30 years imprisonment, five years supervised release, \$250,000 fine, \$ 100 special assessment

Count Sixty-Two: Title 18, United States Code, Section 1956(h) [Money Laundering Conspiracy]

The maximum penalty for a § 1956(h) conspiracy is the same as the penalty for the offense that is the object of the conspiracy, *i.e.*, 20 years for a § 1956 offense, and 10 years for a § 1957 offense as follows:.

Title 18, United States Code, Section 1956(a)(1)(B)(i) [Money Laundering]

20 imprisonment, three years supervised release, \$500,000 fine or twice the value of the property involved in the transaction, whichever is greater, and \$100 special assessment.

Title 18, United States Code, Section 1957 [Money Laundering: Transactions Greater than \$10,000]

10 years imprisonment, 3 years supervised release, \$100 special assessment, and \$250,000 fine (or not more than twice the amount of the criminally derived property involved in the transaction).

Count Ninety-Nine Through One Hundred Thirteen: Title 18, United States Code, Section 1957 [Money Laundering: Transactions Greater than \$10,000]

See penalties above

**United States District Court**

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

**FILED**  
JUL 17 2008  
RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

UNITED STATES OF AMERICA,

V.

08-477

DLJ

EDITH NELSON (a/k/a EDITH  
HONRUBIA NELSON, a/k/a EDITH  
GRUTAS), RONALD NELSON, NELDA  
ASUNCION, and CRISTETA  
LAGAREJOS,

DEFENDANT(S).

**INDICTMENT**

18 U.S.C. § 1349 [Conspiracy to Commit Bank Fraud];  
18 U.S.C. § 1344 [Bank Fraud]; 18 U.S.C. § 1349 [Conspiracy to  
Commit Wire Fraud]; 18 U.S.C. § 1343 [Wire Fraud];  
18 U.S.C. § 1956(h) [Conspiracy to Commit Money Laundering];  
18 U.S.C. § 1957(a) [Monetary Transactions Using Criminal  
Derived Property]; 26 U.S.C. § 7201 [Income Tax Evasion];  
18 U.S.C. § 2 [Aiding & Abetting];  
8 U.S.C. § 1324(a)(1)(A)(iii) [Harboring of Illegal Aliens]

A true bill.

Foreman

Filed in open court this 17<sup>th</sup> day of

July 2008.

Clerk

Bail, \$

*No bail arrest warrant for each defendant.*  
*Wagner D. Brazil 7-17-08*

JOSEPH P. RUSSONIELLO (CABN 44332)  
United States Attorney

FILED

JUL 17 2008

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

CRO8-477

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDITH NELSON  
a/k/a EDITH HONRUBIA NELSON, a/k/a  
EDITH GRUTAS,  
RONALD NELSON,  
NELDA ASUNCION, and  
CRISTETA LAGAREJOS,

Defendants.

Criminal No.

VIOLATIONS: 18 U.S.C. § 1349  
[Conspiracy to Commit Bank Fraud and  
Wire Fraud]; 18 U.S.C. § 1344 (1) and (2)  
[Bank Fraud]; 18 U.S.C. § 1343 [Wire  
Fraud]; 18 U.S.C. § 1956(h) [Conspiracy to  
Commit Money Laundering]; 18 U.S.C. §  
1957(a) [Monetary Transactions Using  
Criminally Derived Property]; 26 U.S.C. §  
7201 [Income Tax Evasion]; 8 U.S.C. §  
1324(a)(1)(A)(iii) [Harboring of Illegal  
Aliens]; 18 U.S.C. § 2 [Aiding & Abetting]

OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

At all times relevant to this indictment:

1. Defendants Edith Nelson and Ronald Nelson, a married couple ("the Nelsons"), owned and operated Placement Services, a referral service located at 1800 Oak Park Blvd., Suite C, Pleasant Hill, California, that placed elderly people into residential care home facilities. On or about August 21, 1998, the Department of Social Services, State of California, ordered the immediate

Document No.

1 KC  
District Court  
Criminal Case Processing

1 exclusion of defendants Ronald and Edith Nelson (under her former name "Edith Grutas") from all  
2 facilities licensed by the Department based upon various violations of licensing requirements,  
3 including deficient care of elderly residents. Despite the exclusion order, the Nelsons have continued  
4 to operate numerous Residential Care Home Facilities for the Elderly ("RCFE") and other properties,  
5 in the identities of others used to purchase the properties ("straw buyers").

6 2. Defendant Nelda Asuncion is a real estate agent and co-owner of Realty World  
7 Pacific West, a real estate business at 1842 Colfax Street, Concord, California. Prior to defendant  
8 Nelda Asuncion's partner obtaining a broker's license for conducting mortgage business, Realty  
9 World Pacific West processed mortgages through Abacus Financial, a mortgage broker business  
10 owned by another individual.

11 3. Defendant Cristeta Lagarejos is a real estate agent and broker, and the owner of  
12 Realty World - The Legacy/Legacy Financing ("Legacy Financing"), a real estate and mortgage  
13 broker business at 91 Gregory Lane, Suite 1, Pleasant Hill, California.

14 A. INTRODUCTION

15 4. Beginning no later than on or about December 23, 2002, and continuing until on or  
16 about January 8, 2007, in the Northern District of California and elsewhere, the defendants, Edith  
17 Nelson, Ronald Nelson, Nelda Asuncion, Cristeta Lagarejos, and others did knowingly devise and  
18 execute a material scheme and artifice to defraud financial institutions, many of which were federally  
19 insured and others which were not, and to obtain moneys, funds, credits, assets, securities, and other  
20 property owned by, and under the custody and control of, the financial institution by means of  
21 material false and fraudulent pretenses, representations, and promises.

22 5. Beginning on or about December 23, 2002, through on or about January 8, 2007, the  
23 defendants secured through straw buyers at least 63 loans, totaling over \$20 million in loan proceeds,  
24 from financial institutions based on false and fraudulent representations. Of the 63 loans,  
25 Defendants Edith Nelson and Nelda Asuncion secured at least 51 loans from financial institutions,  
26 totaling over \$17 million in loan proceeds. Defendants Edith Nelson and Cristeta Lagarejos secured  
27 at least 12 loans, totaling over \$3 million in loan proceeds, from financial institutions.  
28

1           6.       Beginning on or about December 23, 2002 through on or about January 8, 2007, the  
2 defendants laundered the proceeds from specified unlawful activities, *i.e.*, bank fraud and wire fraud,  
3 by causing transactions, totaling over \$20 million, to be disbursed from escrow accounts opened by  
4 straw buyers. Defendants Edith Nelson and Nelda Asuncion caused financial transactions totaling  
5 over \$17 million to be disbursed from 27 escrow accounts of straw buyers. Defendants Edith Nelson  
6 and Cristeta Lagarejos caused financial transactions, totaling over \$3 million, to be disbursed from  
7 six escrow accounts of straw buyers.

8           7.       Some of the financial institutions from which mortgages were fraudulently obtained  
9 were insured by the Federal Deposit Insurance Corporation ("FDIC"). Other financial institutions  
10 from which mortgages were fraudulently obtained that were not FDIC insured wired the mortgage  
11 proceeds to the title companies through the Federal Reserve Bank's Fedwire Funds Transfer System  
12 (Fedwire). All of the proceeds (both FDIC and non-FDIC insured) were wired through Fedwire and  
13 transmitted to the Federal Reserve Bank's processing center in New Jersey prior to the proceeds  
14 being wired to the beneficiaries. As such, the wiring of loan proceeds via Fedwire to the title  
15 companies in California affected interstate commerce.

16                               B. ROLES OF THE DEFENDANTS

17           8.       The role of each defendant in the conspiracies is generally described as follows:

18                   a. Defendant Edith Nelson: Placement Services

19           Defendant Edith Nelson's role included, but was not limited to, (a) recruiting straw  
20 buyers and RCFE buyers; (b) entering into agreements with straw buyers and RCFE buyers; (c)  
21 paying straw buyers for the use of their names to purchase RCFEs and other properties controlled  
22 by the Nelsons; (d) conspiring with Defendants Nelda Asuncion and Cristeta Lagarejos to prepare  
23 fraudulent loan applications and real estate documents under straw buyers and RCFE buyers; (e)  
24 verifying, and instructing her employees at Placement Services to verify, fraudulent information  
25 placed on the straw buyers' loan applications when lenders called to verify employment; (f)  
26 providing "show money" to at least one RCFE buyer to deposit into her bank account during the loan  
27 approval process to defraud lenders into believing that the RCFE buyer had additional assets; (g)  
28 instructing straw buyers to sign grant deeds transferring or adding defendant Edith Nelson's name

1 to the title of the property as a "gift," and at times filing those grant deeds with Contra Costa County  
2 Records after escrow closed; (h) causing many straw buyers to open bank accounts which were then  
3 controlled by defendants Edith and Ronald Nelson, including deposits, withdrawals, and transfer of  
4 monies from those bank accounts to other bank accounts controlled by defendants Edith and Ronald  
5 Nelson; (i) at times, providing title companies with specific disbursement instructions for the  
6 proceeds from the sale of properties purchased by straw buyers; (j) receiving the proceeds of the  
7 property sales directly from the title companies or from the straw sellers whose bank accounts  
8 received the proceeds from the title companies; and (k) functioning as an employer and manager of  
9 the numerous RCFEs and other properties purchased by straw buyers, but controlled by defendants  
10 Edith and Ronald Nelson.

11 b. Defendant Ronald Nelson: Placement Services

12 Defendant Ronald Nelson's role included, but was not limited to: (a) recruiting at  
13 least one straw buyer to purchase a RCFE controlled by the Nelsons, soliciting the straw buyer to  
14 enter into an agreement with defendant Edith Nelson regarding the ownership and control of the  
15 RCFE, and composing, together with the straw buyer, the memorandum of understanding which was  
16 then signed by defendant Edith Nelson and the straw buyer; (b) reviewing the paperwork associated  
17 with another straw buyer's purchase of RCFEs controlled by defendants Edith and Ronald Nelson  
18 prior to the straw buyer's signing the paperwork; (c) attending a meeting with defendants Edith  
19 Nelson and Nelda Asuncion, and a RCFE buyer who was recruited by defendants Edith Nelson and  
20 Nelda Asuncion and whose loan applications were fraudulently prepared by defendant Nelda  
21 Asuncion, during which defendant Ronald Nelson participated in the decision on how the \$400,000  
22 purchase price for the business of a RCFE controlled by defendants Edith and Ronald Nelson should  
23 be paid and disbursed by the RCFE buyer, which included the payment of two checks to defendant  
24 Ronald Nelson for \$116,000 and \$100,000; and (d) functioning as an employer, bookkeeper, check  
25 issuer, and performing other responsibilities associated with operating and controlling the numerous  
26 RCFEs and other properties purchased by straw buyers.

1           c.     Defendant Nelda Asuncion: Realty World Pacific West

2           Defendant Nelda Asuncion's role included, but was not limited to, (a) recruiting  
3 straw buyers; (b) preparing, and instructing her employee at Realty World Pacific West to prepare  
4 fraudulent loan applications and real estate documents in the names of straw buyers and RCFE  
5 buyers; (c) sending faxes, and instructing her employee at Realty World Pacific West to send faxes,  
6 to Placement Services with a summary of the employment information fraudulently placed on the  
7 straw buyers' loan applications so that Placement Services could falsely verify employment  
8 information to lenders called to verify employment; (d) processing, and instructing her employee at  
9 Realty World Pacific West to process loan packages before submitting them to financial institutions;  
10 (e) providing "show money" to at least one RCFE buyer to deposit into her bank account during the  
11 loan approval process to defraud lenders into believing that the RCFE buyer had additional assets;  
12 (f) providing instructions to title companies on how to disburse the proceeds from the sale of  
13 properties purchased by straw buyers; (g) receiving the proceeds of the property sales from the title  
14 companies or the straw sellers to whose bank accounts the proceeds were wired; and (h) receiving  
15 compensation in the form of commissions that were paid to Realty World Pacific West or Abacus  
16 Financial from the escrow accounts.

17           d.     Defendant Cristeta Lagarejos: Legacy Financing

18           Defendant Cristeta Lagarejos's role included, but was not limited to: (a) recruiting  
19 straw buyers; (b) preparing fraudulent loan applications and real estate documents in the names of  
20 straw buyers; (c) processing loan packages and submitting them to financial institutions; (d)  
21 instructing straw buyers to remit the proceeds of the property sales, wired from the title companies,  
22 to defendant Edith Nelson; (e) receiving a disbursement from the escrow account of a straw buyer  
23 in the amount of \$41,200; and (f) receiving commissions that were paid to Legacy Financing from  
24 the escrow accounts.



1 COUNT ONE: (18 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud and Wire Fraud)

2 9. The factual allegations contained in paragraphs one through eight, paragraph eleven,  
3 and paragraphs fourteen, sixteen, eighteen, and twenty, are realleged and incorporated by reference  
4 as though fully set forth herein.

5 10. Beginning no later than on or about December 23, 2002, and continuing until on or  
6 about January 8, 2007, in the Northern District of California and elsewhere, the defendants,

7 EDITH NELSON (a/k/a EDITH HONRUBIA NELSON,  
8 a/k/a EDITH GRUTAS), RONALD NELSON, NELDA ASUNCION,  
and CRISTETA LAGAREJOS,

9 did knowingly conspire with each other, and with other persons both known and unknown to the  
10 grand jury, to knowingly devise and intend to devise a scheme and artifice to defraud financial  
11 institutions and to obtain money and property by means of materially false and fraudulent pretenses,  
12 representations, and promises, well knowing at the time that the pretenses, representations, and  
13 promises were false and fraudulent when made, and for the purpose of executing such scheme and  
14 artifice, and to transmit and cause to be transmitted by means of wire communications in interstate  
15 commerce certain writings, signs, and signals, namely wire transfers, in violation of Title 18, United  
16 States Code, Sections 1343 and 1344 (1) & (2).

17 C. MANNER AND MEANS

18 11. The objects, manner, and means of the defendants in carrying out the conspiracy  
19 included the following:

20 a. The defendants fraudulently obtained mortgage proceeds from financial  
21 institutions through straw buyers to purchase RCFEs and other properties controlled by defendants  
22 Edith and Ronald Nelson.

23 b. The defendants recruited straw buyers to purchase existing RCFEs under the  
24 control of defendants Ronald Nelson and Edith Nelson, or properties that would be converted into  
25 RCFEs.

26 c. The defendants told the straw buyers that the properties would be purchased  
27 in their names and that the properties would be sold after approximately one year.

1           d.       The defendants purchased and sold the same properties using different straw  
2 buyers.

3           e.       The defendants represented to the straw buyers that, during their titular  
4 ownership of the respective property, the defendants would pay for all of the expenses associated  
5 with the property, including the mortgage payments, property taxes, and capital gains taxes.

6           f.       The defendants paid the straw buyers \$5,000 or \$10,000 for each purchase  
7 and, at times, \$5,000 or \$10,000 when the properties were sold.

8           g.       The defendants failed to make timely mortgage payments, causing many of  
9 the properties to default or to be foreclosed.

10          h.       The defendants caused the mortgage loan applications to be prepared based  
11 upon fraudulent representations, including gross monthly income.

12          i.       The defendants caused the properties to be purchased with 100% financing  
13 under "stated income loans," in which lenders verify only employment information, assets and  
14 liabilities, and do not verify gross monthly income.

15          j.       The defendants determined the lender's acceptable debt to income ratio via  
16 a computer software program and then prepared the income portion of the loan application to meet  
17 that ratio, using income charts to see what income was reasonable for the particular profession.

18          k.       The defendants sent faxes to Placement Services with a summary of the  
19 employment information fraudulently placed on the loan applications, and then falsely corroborated  
20 the employment information placed on the loan applications when the lenders called to verify  
21 employment.

22          l.       At the direction of the defendants, the loan proceeds obtained by straw buyers  
23 were wired or deposited into escrow accounts at the title companies under false and fraudulent  
24 pretenses for the purchase of the properties.

25          m.       At the direction of the defendants, the title companies disbursed proceeds from  
26 the escrow accounts to Edith Nelson or other individuals related to or associated with defendant  
27 Edith Nelson, including the straw sellers, who would then remit the gains from those sales to  
28 defendant Edith Nelson.

n. The defendants recruited other individuals to purchase properties to convert into RCFEs or to purchase existing RCFEs. Defendant Nelda Asuncion or her employee, at the direction of Asuncion, prepared "stated income loan" applications for the RCFE buyers.

#### D. OVERT ACTS

12. During the course of the conspiracy, and to accomplish its objectives, the defendants and others committed the following overt acts, among others, in the Northern District of California, and elsewhere:

a. From in or about 2002 through in or about 2007, defendants Edith Nelson and Nelda Asuncion recruited straw buyers and RCFE buyers to purchase and refinance the following real estate properties:

- (1) 2180 La Orinda Place, Concord
- (2) 4919 Union Mine Road, Antioch
- (3) 2267 Shannon Lane, Walnut Creek
- (4) 2852 Stratford Drive, San Ramon
- (5) 1586 Placer Drive, San Ramon
- (6) 330 El Divisadero Avenue, Walnut Creek
- (7) 121 Warwick Avenue, Walnut Creek
- (8) 1213 St. Elizabeth Court, Concord
- (9) 3546 Concord Boulevard, Concord
- (10) 1772 Geary Road, Walnut Creek
- (11) 871 Brittany Lane, Concord
- (12) 134 Pueblo Drive, Pittsburg
- (13) 130 El Cerro Court, Danville
- (14) 1116 Jaime Drive, Concord
- ((15) 4124 Forestview Avenue, Concord
- (16) 2562 Venado Camino, Walnut Creek
- (17) 667 Imperial Drive, Pacifica

b. From in or about 2004 through in or about 2007, defendants Edith Nelson and Cristeta Lagarejos recruited straw buyers to purchase and refinance the following real estate properties:

- (1) 1785 Thornwood Drive, Concord
- (2) 2180 La Orinda Place, Concord
- (3) 2852 Stratford Drive, San Ramon

c. From in or about 2002 through in or about 2007, defendant Edith Nelson represented to the straw buyers that she would pay all of the expenses associated with the property, including the mortgage payments, property taxes, and capital gains taxes.

1           d.       From in or about 2002 through in or about 2006, defendant Edith Nelson paid  
2 the straw buyers \$5,000 or \$10,000 for each purchase and, at times, \$5,000 or \$10,000 when the  
3 properties were sold.

4           e.       From in or about 2002 through in or about 2006, defendant Nelda Asuncion  
5 and her employee, at the direction of Asuncion, prepared loan applications for the straw buyers based  
6 on false and fraudulent representations as set forth above.

7           f.       From in or about 2002 through in or about 2006, defendant Nelda Asuncion  
8 and her employee, at the direction of Asuncion, caused adjustable rate notes to be signed by the straw  
9 buyers promising to pay the loans.

10          g.       From in or about 2004 through in or about 2007, defendant Cristeta Lagarejos  
11 prepared loan applications for the straw buyers based on false and fraudulent representations.

12          h.       From in or about 2004 through in or about 2007, defendant Cristeta Lagarejos  
13 caused adjustable rate notes to be signed by the straw buyers promising to pay the loans.

14          i.       From in or about 2002 through in or about 2006, defendant Nelda Asuncion,  
15 or her employee at the direction of Asuncion, processed the loan packages and submitted them to  
16 federally insured financial institutions, such as Long Beach Mortgage/Washington Mutual Bank,  
17 World Savings Bank, Fremont Investment and Loan, and WMC Mortgage.

18          j.       Beginning in or about 2003 through 2006, defendant Nelda Asuncion, or her  
19 employee at the direction of Asuncion, processed loan packages and submitted them to non-  
20 federally insured financial institutions, such as Fieldstone Mortgage, First NLC Financial,  
21 Countrywide Home Loans, The Loan Center, and First Magnus Financial.

22          k.       From in or about 2004 through in or about 2007, defendant Cristeta Lagarejos  
23 processed the loan packages and submitted them to federally insured financial institutions, such as  
24 WMC Mortgage and Lehman Brothers Bank.

25          l.       From in or about 2005 through in or about 2007, defendant Cristeta Lagarejos  
26 processed the loan packages and submitted them to non-federally insured financial institutions, such  
27 as Finance America and PMC Bancorp.

1 m. From in or about 2002 through in or about 2006, defendant Nelda Asuncion,  
2 or her employee at the direction of Asuncion, sent faxes to Placement Services with a summary of  
3 the fraudulent employment information placed on the straw buyers' loan applications prepared by  
4 Realty World Pacific West allowing defendant Edith Nelson and her employees at Placement  
5 Services to falsely corroborate that information when the lenders called to verify employment.

6 n. From in or about 2002 through in or about 2006, defendant Edith Nelson, or  
7 her employees at Placement Services at the direction of defendant Nelson, corroborated to the  
8 lenders who called to verify the fraudulent employment information contained on the straw buyers'  
9 loan applications prepared by Realty World Pacific West.

10 o. From in or about 2002 through in or about 2007, defendant Edith Nelson  
11 verified to lenders the straw buyers' rental status and history. The straw buyers' residential  
12 information on the loan applications was at times listed as addresses associated with defendant Edith  
13 Nelson, who was fraudulently identified as the property manager or landlord.

14 p. From in or about 2002 through in or about 2006, defendants Edith Nelson and  
15 Nelda Asuncion provided at least one RCFE buyer with "show money" to deposit into her bank  
16 account during the loan approval process to defraud lenders into believing that the RCFE buyer had  
17 additional assets.

18 q. From in or about 2003 through in or about 2007, defendants Edith Nelson,  
19 Nelda Asuncion, and Cristeta Lagarejos caused the financial institutions to wire transfer the  
20 mortgage proceeds via the Federal Reserve Bank's Fedwire Funds Transfer System (Fedwire) to the  
21 title companies handling the escrows in California, thereby affecting interstate commerce.

22 r. From in or about 2002 through in or about 2006, defendant Edith Nelson  
23 caused straw buyers to sign grant deeds transferring or adding Nelson's name to the title of the  
24 property as a "gift." Some of the grant deeds were filed with Contra Costa County Records after  
25 escrow closed.

26 s. From in or about 2002 through in or about 2006, defendant Edith Nelson  
27 caused straw buyers to open bank accounts which were then controlled by defendants Edith and  
28

1 Ronald Nelson, including deposits, withdrawals, and transfer of monies from those bank accounts  
2 to other bank accounts controlled by the Nelsons.

3 t. From in or about 2003 through in or about 2005, defendants Edith Nelson and  
4 Nelda Asuncion directed title companies as to how the proceeds from the sale of properties should  
5 be disbursed, including the following:

6 (1) On or before October 27, 2003, defendants Edith Nelson, Nelda Asuncion,  
7 or a co-conspirator directed a title company to wire transfer monies to Edith Nelson in the amount  
8 of \$91,594.14 and the rest of the proceeds to defendant Nelda Asuncion related to the sale of 871  
9 Brittany Lane, Concord. This property was purchased by a RCFE buyer whose loan applications  
10 were fraudulently prepared by defendant Nelda Asuncion's employee at the direction of Asuncion.

11 (2) On or before June 10, 2004, defendant Edith Nelson or a co-conspirator  
12 directed a title company to disburse \$57,412.88 related to the sale of 134 Pueblo Drive, Pittsburg,  
13 to Bank of Walnut Creek account no. 1361791, which was opened by defendant Edith Nelson and  
14 her aunt. This property was purchased by a straw buyer whose loan applications were fraudulently  
15 prepared by Nelda Asuncion's employee at the direction of Asuncion.

16 (3) On or before June 6, 2005, defendant Nelda Asuncion sent a fax dated June  
17 3, 2005 with instructions to wire transfer monies related to the sale of 134 Pueblo Drive, Pittsburg  
18 (purchased by a straw buyer) to defendant Edith Nelson's Bank of Walnut Creek account no.  
19 1381938, which had been opened in the name of Fibercraft USA Inc. whose agent was defendant  
20 Ronald Nelson.

21 (4) On or about June 17, 2005, defendant Edith Nelson faxed a letter to the title  
22 company related to the sale of the property located at 330 El Divisadero, Walnut Creek (purchased  
23 by a straw buyer) with instructions to wire the disbursement amount to Bank of Walnut Creek  
24 account no. 1361899, which had been opened by defendant Edith Nelson and another straw buyer.

25 u. From in or about 2002 through in or about 2007, defendant Edith Nelson  
26 caused the straw sellers to provide defendant Nelson with the proceeds of the property sales that the  
27 title companies had wired into the straw seller's bank accounts.



1           v.       From in or about 2003 to in or about 2004, defendant Ronald Nelson (1)  
2 recruited a straw buyer to purchase the RCFE located at 121 Warwick Avenue, Walnut Creek  
3 (controlled by the Nelsons); (2) introduced the straw buyer to defendant Edith Nelson; (3) explained  
4 to the straw buyer that he (Ronald) and defendant Edith Nelson had difficulty with the state licensing  
5 authority in regards to obtaining the proper paperwork to operate a residential care home facility for  
6 the elderly, (4) invited the straw buyer to Placement Services and explained that he (Ronald) and  
7 defendant Edith Nelson owned care home facilities, intended to open additional facilities, and sought  
8 partnerships in these facilities; (5) met with the straw buyer, together with defendant Edith Nelson,  
9 and discussed how the business and property transactions would take place; (7) together with  
10 defendant Edith Nelson, decided the amount of money that the straw buyer should invest in the  
11 RCFE business and property at 121 Warwick Drive; (8) composed, together with the straw buyer,  
12 the wording of the Memorandum of Understanding regarding the ownership and operation of the  
13 RCFE; (9) was present when defendant Edith Nelson and the straw buyer signed the Memorandum  
14 of Understanding dated January 22, 2004 which made the straw buyer a 50% partner in the business  
15 and property at 121 Warwick Drive; (10) set up JAK Limited Liability Corporation ("LLC") to  
16 operate the RCFE and added the straw buyer's name to the documents associated with the LLC; (11)  
17 requested that the straw buyer sign blank checks for the JAK LLC bank account at 121 Warwick  
18 Drive, which was opened in the names of the straw buyer and Edith Nelson's daughter (Ronald  
19 Nelson's step-daughter); (12) told the straw buyer that his step-daughter had signatory authority on  
20 the RCFE's bank account so that the Nelsons could protect their interests in the RCFE; and (13)  
21 reassured the straw buyer whenever he expressed any reservations about the foregoing arrangements.

22           w.       In or about August 2004, defendant Nelda Asuncion directed her employee to  
23 prepare prepared fraudulent loan applications for the straw buyer discussed in paragraph 12v above.

24           x.       On or about October 20, 2005, a defendant caused Sierra Shasta Investments  
25 LLC ("Sierra Shasta"), whose agent is defendant Ronald Nelson, to receive a check for \$125,400.58  
26 (check no. 1749 dated October 20, 2005) from a straw seller who was wired proceeds in the amount  
27 of \$135,400.58 by a title company based upon the sale of the RCFE located at 2180 La Orinda Place,  
28 Concord, which was controlled by defendants Ronald and Edith Nelson.



1           y.       In or before June 2005, defendant Edith Nelson told at least one straw buyer  
2 that defendant Ronald Nelson was an accountant and that all of the paperwork associated with the  
3 straw buyer's purchase of the properties controlled by the defendants Ronald and Edith Nelson was  
4 carefully reviewed by defendant Ronald Nelson to ensure that the paperwork was correct before the  
5 straw buyer signed any papers. Defendant Edith Nelson further told the straw buyer that defendant  
6 Ronald Nelson was consulted on everything and he made sure that the entire operation was running  
7 smoothly.

8           z.       On or about October 25, 2005, defendants Edith Nelson, Ronald Nelson, and  
9 Nelda Asuncion met with a RCFE buyer who had refinanced her personal residence through  
10 defendant Nelda Asuncion and obtained \$400,000 to purchase an RCFE from the Nelsons.  
11 Defendant Nelda Asuncion prepared the RCFE buyer's loan application based on fraudulent  
12 information, such as gross monthly income. At the meeting on or about October 25, 2005,  
13 defendants Ronald Nelson, Edith Nelson, and Nelda Asuncion discussed how the \$400,000 purchase  
14 price for the business of an RCFE controlled by defendants Ronald and Edith Nelson (located at  
15 2267 Shannon Lane, Walnut Creek) would be distributed. The defendants instructed the RCFE  
16 buyer to split the \$400,000 purchase price for the business into four checks as follows: check no.  
17 2307 for \$116,000 payable to Ronald Nelson, check no. 2308 for \$100,000 payable to defendant  
18 Ronald Nelson, check no. 2306 for \$100,000 payable to defendant Nelda Asuncion, and check no.  
19 2305 for \$84,000 payable to the co-owner of Realty World Pacific West (and defendant Nelda  
20 Asuncion's partner).

21           aa.     During the entire period of the conspiracy, defendant Edith Nelson functioned  
22 as an employer and manager of the numerous RCFEs and other properties purchased under straw  
23 buyers, but which the Nelsons controlled.

24           bb.     During the entire period of the conspiracy, defendant Ronald Nelson  
25 functioned as an employer, bookkeeper, check issuer, and performed other responsibilities associated  
26 with operating and controlling the numerous RCFEs and other properties purchased under straw  
27 buyers.

28           All in violation of Title 18, United States Code, Section 1349.

**COUNTS TWO THROUGH TWENTY-THREE** (18 U.S.C. §§ 1344(1) & (2) and 2 - Bank Fraud & Aiding and Abetting)

13. The factual allegations contained in paragraphs one through eight, and paragraph eleven, are realleged and incorporated by reference as though fully set forth herein.

14. On or about the dates listed below, in the Northern District of California and elsewhere, the defendants,

EDITH NELSON (a/k/a EDITH HONRUBIA NELSON,  
a/k/a EDITH GRUTAS), and NELDA ASUNCION,

did knowingly devise and execute a scheme and artifice to defraud the federally insured financial institutions listed below and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, the financial institutions, by means of material false and fraudulent pretenses, representations, and promises:

Count	Close of Escrow Date	Property	Straw Buyer/RCFE Buyers	FDIC Insured Financial Institution	Loan #	Loan Amount	Escrow Co. & Escrow #
2	12/23/02	2852 Stratford Drive, San Ramon	Rosalina B.	World Savings	0020034096	\$339,500	Placer Title 803-5842
3	12/23/02	2852 Stratford Drive, San Ramon	Rosalina B.	World Savings	0020034104	\$97,000	Placer Title 803-5842
4	3/20/03	4919 Union Mine Road, Antioch	Myra S.	Long Beach Mortgage	5227855	\$436,000	American Title (Ticor) 43614
5	3/20/03	4919 Union Mine Road, Antioch	Myra S.	Long Beach Mortgage	5227863	\$109,000	American Title (Ticor) 43614
6	6/23/03	121 Warwick Ave., Walnut Creek	Guadalupe V.	Long Beach Mortgage	5509476	\$527,960	Old Republic Title 0111001405

7	6/23/03	121 Warwick Ave., Walnut Creek	Guadalupe V.	Long Beach Mortgage	5509484	\$131,990	Old Republic Title 0111001405
8	10/16/03	2180 La Orinda Place, Concord	Steve P.	Long Beach Mortgage	5934419	\$391,600	Ticor Title Co. 00028685
9	10/16/03	2180 La Orinda Place, Concord	Steve P.	Long Beach Mortgage	5934435	\$97,900	Ticor Title Co. 00028685
10	10/27/03	871 Brittany Lane, Concord	Cynthia & Redentor D.	WMC Mortgage, a GE Bank	10592499	\$416,000	Ticor Title Co. 22514
11	10/27/03	871 Brittany Lane, Concord	Cynthia & Redentor D.	WMC Mortgage, a GE Bank	1059502	\$104,000	Ticor Title Co. 22514
12	5/26/05	3546 Concord Blvd., Concord	Dennis D.	Long Beach Mortgage (Washington Mutual Bank)	6471059	\$548,000	Ticor Title Co. 85593-901
13	5/26/05	3546 Concord Blvd., Concord	Dennis D.	Long Beach Mortgage (Washington Mutual Bank)	6471060	\$137,000	Ticor Title Co. 85593-901
14	6/6/05	1586 Placer Drive, Pittsburg	Shawna D.	Fremont Investment & Loan	7000150164	\$580,000	Ticor Title Co. 86557
15	6/6/05	1586 Placer Drive, Pittsburg	Shawna D.	Fremont Investment & Loan	7000150244	\$145,000	Ticor Title Co. 86557
16	6/17/05	330 El Divisadero Ave., Walnut Creek	Steve P.	Fremont Investment & Loan	7000151064	\$720,000	Ticor Title Co. 77705

17	6/17/05	330 El Divisadero Ave., Walnut Creek	Steve P.	Fremont Investment & Loan	7000151104	\$180,000	Ticor Title Co. 77705
18	7/5/05	2267 Shannon Lane, Walnut Creek	Melinda M-A	Long Beach Mortgage	6508478	\$656,000	Fidelity National Title 05-244318
19	7/5/05	2267 Shannon Lane, Walnut Creek	Melinda M-A	Long Beach Mortgage	6508479	\$164,000	Fidelity National Title 05-244318
20	8/10/06	1772 Geary Rd., Walnut Creek	Eloisa M.	Fremont Investment & Loan	7000212506	\$512,000	Stewart Title B40000358
21	8/10/06	1772 Geary Rd., Walnut Creek	Eloisa M.	Fremont Investment & Loan	7000212743	\$128,000	Stewart Title B40000358
22	8/15/06	1213 St. Elizabeth Court, Concord	Eloisa M.	Washington Mutual Bank	0729406322	\$600,000	Stewart Title Co. B40000529
23	8/15/06	1213 St. Elizabeth Court, Concord	Eloisa M.	Long Beach Mortgage	0729406421	\$150,000	Stewart Title Co. B40000529

All in violation of Title 18, United States Code, Sections 1344(1) and (2), and 2.

**COUNTS TWENTY-FOUR THROUGH THIRTY-ONE** (18 U.S.C. §§ 1344(1) and (2) & 2 - Bank Fraud & Aiding and Abetting)

15. Factual allegations contained in paragraphs one through eight, and paragraph eleven, are realleged and incorporated by reference as though fully set forth herein.

16. On or about the dates listed below, in the Northern District of California and elsewhere, the defendants,

EDITH NELSON (a/k/a EDITH HONRUBIA NELSON,  
a/k/a EDITH GRUTAS), and CRISTETA LAGAREJOS,

did knowingly devise and execute a scheme and artifice to defraud the federally insured financial institutions listed below and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, the financial institutions, by means of material false and fraudulent pretenses, representations, and promises:

Count	Close of Escrow Date	Property	Straw Buyer	FDIC Insured Financial Institution	Loan #	Loan Amount	Escrow Co. & Escrow #
24	8/17/04	2180 La Orinda Place, Concord	Lucia L.	WMC Mortgage a GE Bank	11030997	\$460,000	Ticor Title Co. 60451-914
25	8/17/04	2180 La Orinda Place, Concord	Lucia L.	WMC Mortgage a GE Bank	11030999	\$115,000	Ticor Title Co. 60451-914
26	12/2/04	1785 Thornwood Drive, Concord	Antonio R.	WMC Mortgage	11075811	\$344,000	North American Title 54702-54200980
27	12/2/04	1785 Thornwood Drive, Concord	Antonio R.	WMC Mortgage	11075812	\$86,000	North American Title 54702-54200980
28	5/2/05	2852 Stratford Drive, San Ramon	Steve P.	WMC Mortgage a GE Bank	11181857	\$568,000	Old Republic Title 0130003294

29	5/2/05	2852 Stratford Drive, San Ramon	Steve P.	WMC Mortgage a GE Bank	11181858	\$142,000	Old Republic Title 0130003294
30	3/22/06	1785 Thornwood Drive, Concord	Lucia L.	Lehman Brothers Bank FSB	00378523 16	\$110,000	Old Republic Title 0130004208
31	3/22/06	1785 Thornwood Drive, Concord	Lucia L.	Lehman Brothers Bank FSB	00378519 53	\$440,000	Old Republic 0130004208

All in violation of Title 18, United States Code, Sections 1344(1) & (2), and 2.

COUNTS THIRTY-TWO THROUGH FIFTY-SEVEN: (18 U.S.C. §§ 1343 & 2 - Wire Fraud & Aiding and Abetting)

17. The factual allegations contained in paragraphs one through eight, and paragraph eleven, are realleged and incorporated by reference as though fully set forth herein.

18. On or about the dates listed below, in the Northern District of California, and elsewhere, the defendants,

EDITH NELSON (a/k/a EDITH HONRUBIA NELSON,  
a/k/a EDITH GRUTAS), and NELDA ASUNCION,

did knowingly devise and intend to devise a scheme and artifice to defraud financial institutions and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, well knowing at the time that the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted by means of wire communications in interstate commerce, namely, the wire transfers identified below:

Count	Wire Date	Property	Straw Buyer/RCFE Buyer	Financial Institution	Loan #	Loan Amount	Escrow Co. & Escrow #	Wire Amount
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32	4/1/03	134 Pueblo Drive, Pittsburg	Myra S.	Fieldstone Mortgage	058369 3965	\$314,500	Old Republic Title 375768	\$316,618
33	4/1/03	134 Pueblo Drive, Pittsburg	Myra S.	Fieldstone Mortgage	058369 5965	\$55,500	Old Republic Title 375768	\$55,196
34	5/27/03	3546 Concord Blvd., Concord	Dulce P.	1 <sup>st</sup> NLC Financial	303020 83	\$412,250	Ticor Title Co. 01110010 26	\$410,891.10
35	9/10/03	330 El Divisadero, Walnut Creek	Guadalupe V.	1 <sup>st</sup> NLC Financial	303032 11 & 303032 12	\$700,000	Ticor Title Co. 00015245	\$695,702.63
36	6/8/04	1772 Geary Road, Walnut Creek	Eloisa M.	The Loan Center	04-16923	\$352,000	North Amer. Title Co. 54702-54200309	\$351,263.06
37	6/8/04	1772 Geary Road, Walnut Creek	Eloisa M.	The Loan Center	04-16924	\$88,000	North Amer. Title Co. 54702-54200309	\$86,852.41
38	6/9/04	134 Pueblo Drive, Pittsburg	Eloisa M.	First NLC Financial	524040 2665	\$352,000	Ticor Title Co. 00052792	\$352,971.68
39	6/9/04	134 Pueblo Drive, Pittsburg	Eloisa M.	First NLC Financial	524040 2674	\$88,000	Ticor Title Co. 00052792	\$86,833.66
40	8/10/04	121 Warwick Ave., Walnut Creek	Samuel B.	The Loan Center	04-17975	\$568,000	North American Title Co. 54702-54200588	\$568,686.45



41	8/10/04	121 Warwick Ave., Walnut Creek	Samuel B.	The Loan Center	04- 17976	\$142,000	North Amer. Title Co.  54702- 54200588	\$140,554.81
42	10/5/04	871 Brittany Lane, Concord	Cynthia & Redentor D.	The Loan Center	04- 19553	\$512,000	North Amer. Title Co.  54702- 54200756	\$514,485.62
43	10/5/04	871 Brittany Lane, Concord	Cynthia & Redentor D.	The Loan Center	04- 19554	\$128,000	North Amer. Title Co.  54702- 54200756	\$124,992.55
44	1/10/05	2562 Venado Camino, Walnut Creek	Rommel V.	Country- wide Home Loans	877439 06	\$640,000	Ticor Title Co.  71476	\$635,501.32
45	1/10/05	2562 Venado Camino, Walnut Creek	Rommel V.	Country- wide Home Loans	877439 14	\$80,000	Ticor Title Co.  71476	\$80,000
46	1/31/05	2562 Venado Camino, Walnut Creek	Rommel V.	Country- wide Home Loans	905571 85	\$160,000	Ticor Title Co.  74949	\$161,155
47	6/3/05	134 Pueblo Drive, Pittsburg	Shawna D.	First NLC Financial	524050 3392	\$500,000	Ticor Title Co.  85592	\$504,316.66
48	6/3/05	134 Pueblo Drive, Pittsburg	Shawna D.	First NLC Financial	524050 3394	\$145,000	Ticor Title Co.  85592	\$144,480.52
49	6/3/05	4124 Forest- view Ave., Concord	Steve P.	Country- wide Home Loans	101069 226	\$512,000	Ticor Title Co.  80467	\$513,462.52

50	6/3/05	4124 Forest-view Ave., Concord	Steve P.	Country-wide Home Loans	101069 234	\$128,000	Ticor Title Co. 80467	\$128,000
51	8/3/05	121 Warwick Ave., Walnut Creek	Dennis D.	Country-wide Home Loans	111292 837	\$650,000	Ticor Title Co. 21010158	\$654,784.42
52	8/3/05	121 Warwick Ave., Walnut Creek	Dennis D.	Country-wide Home Loans	111292 845	\$225,000	Ticor Title Co. 21010158	\$225,000
53	10/24/05	667 Imperial Drive, Pacifica	Alicia F.	First Magnus	792500 7026	\$640,000	Ticor Title Co. 05-21010983	\$646,199.59
54	1/17/06	1116 Jaime Drive, Concord	Melinda M-A	Country-wide Home Loans	124430 906	\$656,000	Ticor Title Co. 21011671	\$651,365.60
55	1/17/06	1116 Jaime Drive, Concord	Melinda M-A	Country-wide Home Loans	124430 914	\$164,000	Ticor Title Co. 21011671	\$164,000
56	2/8/06	130 El Cerro Court, Danville	Shawna D.	Country-wide Home Loans	125899 432	\$788,000	Ticor Title Co. 06210119 81	\$789,059.58
57	2/8/06	130 El Cerro Court, Danville	Shawna D.	Country-wide Home Loans	125899 440	\$98,500	Ticor Title Co. 06210119 81	\$98,500

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS FIFTY-EIGHT THROUGH SIXTY-ONE: (18 U.S. C. §§ 1343 and 2 - Wire Fraud & Aiding and Abetting)

19. The factual allegations contained in paragraphs one through eight, and paragraph eleven are realleged and incorporated by reference as though fully set forth herein.

20. On or about the dates listed below, in the Northern District of California and elsewhere, the defendants,

EDITH NELSON (a/k/a EDITH HONRUBIA NELSON,  
a/k/a EDITH GRUTAS), and CRISTETA LAGAREJOS,

did knowingly devise and intend to devise a scheme and artifice to defraud financial institutions and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, well knowing at the time that the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted by means of wire communications in interstate commerce, namely, the wire transfers identified below:

Count	Wire Date	Property	Straw Buyer	Financial Institution	Loan #	Loan Amount	Escrow Co. & Escrow #	Wire Amount
58	1/18/05	1785 Thorwood Drive, Concord	Antonio R.	Finance America	0041151614	\$416,000	Ticor Title Co. 00072096	\$418,369.89
59	1/18/05	1785 Thorwood Drive, Concord	Antonio R.	Finance America	0041152992	\$104,000	Ticor Title Co. 00072096	\$102,295.96
60	1/5/07	1785 Thorwood Drive, Concord	Jean D.G.	PMC Bancorp.	8944036	\$496,000	Old Republic Title 0111006002	\$499,692.29
61	1/5/07	1785 Thorwood Drive, Concord	Jean D.G.	PMC Bancorp	8944037	\$124,000	Old Republic Title 0111006002	\$124,000

1 All in violation of Title 18, United States Code, Sections 1343 and 2.

2 COUNT SIXTY-TWO: (18 U.S.C. § 1956(h) - Conspiracy to Commit Money Laundering)

3 21. The factual allegations contained in paragraphs one through eight, paragraph eleven,  
4 and paragraphs twenty-five and twenty-seven, are realleged and incorporated by reference as though  
5 fully set forth herein.

6 22. Beginning no later than on or about October 27, 2003, and continuing until on or  
7 about August 15, 2006, in the Northern District of California and elsewhere, the defendants,

8 EDITH NELSON (a/k/a EDITH HONRUBIA NELSON,  
9 a/k/a EDITH GRUTAS), NELDA ASUNCION, and  
10 CRISTETA LAGAREJOS,

11 did knowingly conspire with each other, and with other persons both known and unknown to the  
12 grand jury, to commit offenses against the United States, in violation of Title 18, United States Code,  
13 Sections 1956 and 1957, to wit:

14 a. knowing that property involved in a financial transaction represented the  
15 proceeds of some form of unlawful activity, and which property was in fact the proceeds of specified  
16 unlawful activity, *i.e.*, bank fraud and wire fraud, defendants conducted financial transactions  
17 knowing that those transactions were designed in whole and in part to conceal and disguise the  
18 nature, location, source, ownership, and control of the proceeds of that specified unlawful activity,  
19 in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and

20 b. defendants knowingly engaged in monetary transactions, affecting interstate  
21 commerce, in criminally derived property of a value greater than \$10,000, said property having in  
22 fact been derived from specified unlawful activity, *i.e.*, bank fraud and wire fraud, in violation of 18  
23 U.S.C. § 1957(a).

24 E. MANNER AND MEANS

25 23. The objectives, manner, and means of the defendants in carrying out the money  
26 laundering conspiracy included the following:

27 a. Recruiting straw buyers to purchase, refinance, transfer, and sell real estate  
28 properties controlled by defendants Edith and Ronald Nelson.

1           b.     Purchasing properties in the names of straw buyers to conceal the nature,  
2 location, source, ownership, and control of those properties.

3           c.     Agreeing that the straw buyers would not have to pay the expenses associated  
4 with the property, including the mortgage payments, property taxes, and capital gains taxes.

5           d.     Paying the straw buyers \$5,000 or \$10,000 for each purchase and, at times,  
6 \$5,000 or \$10,000 when the properties were sold.

7           e.     Placing fraudulent information on the straw buyers' loan applications,  
8 including inflated gross monthly income to meet the lender's guidelines for loan approval, place of  
9 employment, assets, residential information, and purpose of the loans.

10          f.     Engaging in fraudulent verifications of employment and other information  
11 contained on the loan applications.

12          g.     Providing "show money" to at least one straw buyer to deposit into their bank  
13 accounts during the loan approval process to defraud lenders into believing that the straw buyers had  
14 more assets than they actually did.

15          h.     Processing the loan packages and submitting them to financial institutions.

16          i.     Causing title company escrows to close with mortgage proceeds that financial  
17 institutions had funded.

18          j.     Causing financial institutions to wire the mortgage proceeds via the Federal  
19 Reserve Bank's Fedwire Funds Transfer System (Fedwire) to the title companies handling the  
20 escrows in California, thereby affecting interstate commerce.

21          k.     Providing the title companies with specific instructions as to how the  
22 mortgage proceeds should be disbursed.

23          l.     Receiving from the straw sellers the wire transfer deposits of the proceeds of  
24 the illegal enterprise into bank accounts held by the straw sellers to conceal the location, ownership,  
25 and control of those funds.

26          m.     Causing straw buyers to open bank accounts which were then controlled by  
27 the Nelsons, including deposits, withdrawals, and transfer of monies from those bank accounts to  
28 other bank accounts controlled by the Nelsons.

n. Using multiple bank accounts to transfer and withdraw funds in order to evade detection by law enforcement.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS SIXTY-THREE THROUGH NINETY-EIGHT: (18 U.S.C. §§ 1957(a) & 2 - Monetary Transactions Using Criminally Derived Property & Aiding and Abetting)

24. The factual allegations contained in paragraphs one through eight, paragraph eleven, and paragraph 23, are realleged and incorporated by reference as though fully set forth herein.

25. On or about the dates listed below, in the Northern District of California and elsewhere, the defendants,

EDITH NELSON (a/k/a EDITH HONRUBIA NELSON,  
a/k/a EDITH GRUTAS), and NELDA ASUNCION,

did knowingly engage in a monetary transactions listed below, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, said property having in fact been derived from specified unlawful activity, namely, bank fraud and wire fraud, as alleged in Counts Two through Sixty-One:

Count	Close of Escrow Date	Property	Straw Buyer	Escrow Co. & Escrow #	Disbursement Amount & Reference Check #	Payee
63	10/27/03	871 Brittany Lane, Concord	Cynthia & Redentor D.	Ticor Title Co. 22514	\$323,172.18 #91504408	World Savings Bank
64	10/27/03	871 Brittany Lane, Concord	Cynthia & Redentor D.	Ticor Title Co. 22514	\$10,226.50 #91504397	Abacus Financial
65	10/27/03	871 Brittany Lane, Concord	Cynthia & Redentor D.	Ticor Title Co. 22514	\$91,594.14 #91504401	Edith Nelson
66	10/27/03	871 Brittany Lane, Concord	Cynthia & Redentor D.	Ticor Title Co. 22514	\$40,000 #91504403	Julieta S.

67	10/27/03	871 Brittany Lane, Concord	Cynthia & Redentor D.	Ticor Title Co.  22514	\$57,280.81  #91504405	Nelda Asuncion
68	6/9/04	1772 Geary Road, Walnut Creek	Eloisa M.	North American Title Co.  54702- 54200309	\$110,115.24  Wire Out	Ernel A.
69	6/9/04	1772 Geary Road, Walnut Creek	Eloisa M.	North American Title Co.  54702- 54200309	\$14,652  #292625	Franchise Tax Board
70	6/9/04	1772 Geary Road, Walnut Creek	Eloisa M.	North American Title Co.  54702- 54200309	\$258,162  Wire Out	GMAC Mortgage Corp.
71	6/9/04	1772 Geary Road, Walnut Creek	Eloisa M.	North American Title Co.  54702- 54200309	\$ 44, 672  #292627	Ditech.com
72	6/10/04	134 Pueblo Drive, Pittsburg	Eloisa M.	Ticor Title Co.  00052792	\$55,982.94  #91509959	Aurora Loan Services
73	6/10/04	134 Pueblo Drive, Pittsburg	Eloisa M.	Ticor Title Co.  00052792	\$313,321.78  #91509965	Willshire Credit Corp.
74	6/10/04  Wire Out on 6/11/04	134 Pueblo Drive, Pittsburg	Eloisa M.	Ticor Title Co. 00052792	\$57,412.88  Wire Out	Edith Nelson
75	10/6/04	871 Brittany Lane, Concord	Cynthia & Redentor D.	North American Title Co.  54702- 54200756	\$ 80,299.39  Wire Out	Wire to Cynthia & Redentor D.'s bank account
76	10/6/04	871 Brittany Lane, Concord	Cynthia & Redentor D.	North American Title Co.  54702- 54200756	\$431,656.69  #295257	Homeeq



77	10/6/04	871 Brittany Lane, Concord	Cynthia & Redentor D.	North American Title Co.  54702- 54200756	\$111,476.77  #295258	Homeeq Servicing
78	6/6/05	1586 Placer Drive, Pittsburg	Eloisa M.	Ticor Title Co.  86557	\$301,661.41  #0102010452	Josefina B.
79	6/6/05	1586 Placer Drive, Pittsburg	Eloisa M.	Ticor Title Co.  86557	\$ 25,375  #0102010454	Accumax Invest Co.
80	6/6/05	1586 Placer Drive, Pittsburg	Eloisa M.	Ticor Title Co.  86557	\$381,690.97  #0102010455	IndyMac Bank
81	6/6/05	1586 Placer Drive, Pittsburg	Eloisa M.	Ticor Title Co.  86557	\$ 12,825  #0102010458	Abacus Financial
82	6/6/05	134 Pueblo Drive, Pittsburg	Shawna D.	Ticor Title Co.  85592	\$166,593.39  #0102030079	Edith Nelson
83	6/6/05	134 Pueblo Drive, Pittsburg	Shawna D.	Ticor Title Co.  85592	\$359,004.74  #0102010421	Willshire Credit Corp.
84	6/6/05	134 Pueblo Drive, Pittsburg	Shawna D.	Ticor Title Co.  85592	\$ 10,825  #0102010429	Abacus Financial
85	6/17/05	330 El Divisadero Ave., Walnut Creek	Steve P.	Ticor Title Co.  77705	\$208,386.25  #0102010889	Litton Loan Servicing
86	6/17/05	330 El Divisadero Ave., Walnut Creek	Steve P.	Ticor Title Co.  77705	\$513,887.65  #0102010891	Wells Fargo Bank
87	6/17/05	330 El Divisadero Ave., Walnut Creek	Steve P.	Ticor Title Co.  77705	\$17,100  #0102010894	Realty World Pacific West

88	6/17/05	330 El Divisadero Ave., Walnut Creek	Steve P.	Ticor Title Co. 77705	\$147,848.83 #0102030147	Edith Nelson
89	10/25/05	667 Imperial Drive, Pacifica	Alicia F.	Ticor Title Co. 05-21010983	\$415,455.13 #0102030956	Alicia F. (Wire Out to Alicia F.'s Acct)
90	10/25/05	667 Imperial Drive, Pacifica	Alicia F.	Ticor Title Co. 05-21010983	\$17,992.19 #0102015437	Realty World Pacific West
91	10/25/05	667 Imperial Drive, Pacifica	Alicia F.	Ticor Title Co. 05-21010983	\$207,944.05 #0102030957	Wells Fargo Loan Payoff
92	2/8/06	130 El Cerro Court, Danville	Shawna D.	Ticor Title Co. 06-21011981	\$152,213.11 #0102018296	Washington Mutual Bank
93	2/8/06	130 El Cerro Court, Danville	Shawna D.	Ticor Title Co. 06-21011981	\$831,040.61 #0102031516	B., Frank and Mary Jane
94	8/15/06	1213 St. Elizabeth Court, Concord	Eloisa M.	Stewart Title Co. B40000529	\$67,046.04 (Wire Out)	Countrywide Loan Loans
95	8/15/06	1213 St. Elizabeth Court, Concord	Eloisa M.	Stewart Title Co. B40000529	\$376,564.89 (Wire Out)	Countrywide Loan Loans
96	8/15/06	1213 St. Elizabeth Court, Concord	Eloisa M.	Stewart Title Co. B40000529	\$15,093.35 #40-22442	Ernel A.
97	8/15/06	1213 St. Elizabeth Court, Concord	Eloisa M.	Stewart Title Co. B40000529	\$250,049.92 (Wire Out)	P., Marcelo & Elma
98	8/15/06	1213 St. Elizabeth Court, Concord	Eloisa M.	Stewart Title Co. B40000529	\$34,000 #40-202447	Realty World Pacific West

All in violation of Title 18, United States Code, Sections 1957(a) and 2.

**COUNTS NINETY-NINE THROUGH ONE HUNDRED THIRTEEN: (18 U.S.C. §§ 1957(a) & 2 - Monetary Transactions Using Criminally Derived Property & Aiding and Abetting)**

26. The factual allegations contained in paragraphs one through eight, paragraph eleven, and paragraph twenty-three, are realleged and incorporated by reference as though fully set forth herein.

27. On or about the dates listed below, in the Northern District of California and elsewhere, the defendants,

EDITH NELSON (a/k/a EDITH HONRUBIA NELSON,  
a/k/a EDITH GRUTAS), and CRISTETA LAGAREJOS,

did knowingly engage in a monetary transactions listed below, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, said property having in fact been derived from specified unlawful activity, namely, bank fraud and wire fraud, as alleged in Counts Two through Sixty-One:

Count	Close of Escrow Date	Property	Straw Buyer	Escrow Co. & Escrow #	Disbursement Amount & Reference Check #	Payee
99	8/17/04	2180 La Orinda Place, Concord	Lucia L.	Ticor Title Co. 60451	\$ 11,070.00 #91408239	Realty World Californians
100	8/17/04	2180 La Orinda Place, Concord	Lucia L.	Ticor Title Co. 60451	\$405,000.06 #91408240	Washington Mutual Bank
101	8/17/04	2180 La Orinda Place, Concord	Lucia L.	Ticor Title Co. 60451	\$ 99,516.27 #91408241	Washington Mutual Bank
102	8/17/04	2180 La Orinda Place, Concord	Lucia L.	Ticor Title Co. 60451	\$ 54,108.78 (Wire Out)	Steve P.
103	1/19/05	1785 Thornwood Drive, Concord	Antonio R.	Ticor Title Co. 00072096	\$ 11,114.50 #91410916	Legacy Financing

104	1/19/05	1785 Thornwood Drive, Concord	Antonio R.	Ticor Title Co. 00072096	\$347,461.79 (Wire Out)	Option One Mortgage Corp.
105	1/19/05	1785 Thornwood Drive, Concord	Antonio R.	Ticor Title Co. 00072096	\$ 87,314.20 (Wire Out)	Option One Mortgage Corp.
106	1/19/05	1785 Thornwood Drive, Concord	Antonio R.	Ticor Title Co. 00072096	\$ 71,859.88 (Wire Out)	Antonio R.
107	5/2/05	2852 Stratford Drive, San Ramon	Steve P.	WMC Mortgage Corp.	\$115,569.56  Wire to Bank of Walnut Creek #1361899 (Edith Nelson & Rosalina B.)	Rosalina B.
108	5/2/05	2852 Stratford Drive, San Ramon	Steve P.	WMC Mortgage Corp.	\$ 12,145 # 3000314342	The Legacy
109	5/2/05	2852 Stratford Drive, San Ramon	Steve P.	WMC Mortgage Corp.	\$347,647.92 # 3000314344	World Savings
110	5/2/05	2852 Stratford Drive, San Ramon	Steve P.	WMC Mortgage Corp.	\$ 98,528.13 # 3000314345	World Savings
111	5/2/05	2852 Stratford Drive, San Ramon	Steve P.	WMC Mortgage Corp.	\$ 37,275.95 # 3000314346	Norma L.
112	5/2/05	2852 Stratford Drive, San Ramon	Steve P.	WMC Mortgage Corp.	\$ 41,200 # 3000314347	Cris Lagarejos
113	5/2/05	2852 Stratford Drive, San Ramon	Steve P.	WMC Mortgage Corp.	\$ 57,590 # 3000314381	Holioak Properties

1 All in violation of Title 18, United States Code, Sections 1957(a) and 2.

2 COUNT ONE HUNDRED FOUTEEN: (26 U.S.C. § 7201 & 2 - Income Tax Evasion & Aiding &  
 3 Abetting)

4 28. On or about November 3, 2003, in the Northern District of California, the defendants,

5 RONALD NELSON and EDITH NELSON  
 6 (a/k/a EDITH HONRUBIA NELSON, a/k/a EDITH GRUTAS),

7 who, during the calendar year 2002, were married, did willfully attempt to evade and defeat any  
 8 income tax due and owing to the United States of America for the calendar year 2002, in addition  
 9 to other penalties provided by law, by causing to be prepared and signing a false and fraudulent joint  
 10 U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal Revenue Service,  
 11 wherein it was stated that their joint taxable income for said calendar year was the sum of \$ 0, and  
 12 that the tax due and owing thereon was the sum of \$3,532.00, whereas, the defendants then and there  
 13 well knew and believed, their true taxable income and additional tax due and owing to the United  
 14 States of America for said calendar year was greater than the amount reported on their joint U.S.  
 15 Individual Income Tax Return, in violation of Title 26, United States Code, Section 7201.

16 COUNT ONE HUNDRED FIFTEEN THROUGH ONE HUNDRED TWENTY-SIX:  
 17 8 U.S.C. § 1324(a)(1)(A)(iii) & 18 U.S.C. § 2 - Harboring of Illegal Alien and Aiding & Abetting)

18 29. Beginning at a time unknown, but not later than in or about the dates listed below,  
 19 and continuing until in or about the dates listed below, in the Northern District of California, the  
 20 defendant,

21 RONALD NELSON and EDITH NELSON  
 22 (a/k/a EDITH HONRUBIA NELSON, a/k/a EDITH GRUTAS),

23 knowing and in reckless disregard of the fact that aliens identified below had come to, entered, and  
 24 remained in the United States in violation of law, did knowingly conceal, harbor, and shield the alien  
 25 from detection, and attempt to conceal, harbor, and shield the alien from detection, in any place,  
 26 in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), and Title 18, United States  
 27 Code, Section 2.

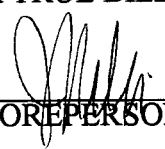
Count	Approximate Start Date	Approximate End Date	Name of Alien
115	April 2002	February 2006	Jeannette G.
116	August 2004	June 2007	Lorenzo C.

117	October 2003	December 2004	Lee M. C.
118	April 2006	June 2007	Felicette U.
119	March 2004	March 2006	Ariel R.D.
120	March 2002	April 2004	Marife R.
121	March 2002	April 2004	Rogelio R.
122	March 2002	May 2004	Maria F.R.
123	January 2006	July 2006	Arturo B.
124	November 2002	September 2003	Susana I.
125	September 2001	November 2005	Anita M.
126	November 2002	September 2003	Maria F.L.L.


All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), and Title 18, United States Code, Section 2 .

DATED: July 17, 2008

A TRUE BILL.

  
FOREPERSON

JOSEPH P. RUSSONIELLO  
United States Attorney

  
STEPHEN G. CORRIGAN  
Acting Chief, Oakland Branch

(Approved as to form: )  
AUSA Deborah R. Douglas